

WILLKIE FARR & GALLAGHER_{LLP}

1875 K Street, N.W.
Washington, DC 20006-1238

Tel: 202 303 1000
Fax: 202 303 2000

January 29, 2025

VIA ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

Re: Consolidation of *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL
("Lively Case") and *Wayfarer Studios LLC et al. v. Lively et al.*, No. 1:25-cv-00449-
LJL ("Wayfarer Case")

Dear Judge Liman:

On behalf of Defendants Blake Lively and Ryan Reynolds in *Wayfarer Studios LLC et al. v. Lively et al.*, No. 1:25-cv-00449-LJL (together, the "Lively-Reynolds Parties"), we write in response to the Court's January 23, 2025 Order regarding possible consolidation of the Lively Case and the Wayfarer Case. *See* Dkt. No. 37. The Lively-Reynolds Parties have no objection to consolidation of the Lively Case and the Wayfarer Case.

We thank the Court for its attention to this matter.

Respectfully submitted,

s/ Michael J. Gottlieb

WILLKIE FARR & GALLAGHER LLP
Michael J. Gottlieb
Kristin E. Bender
Willkie Farr & Gallagher
1875 K Street NW
Washington, DC 20006
(202) 303-1000
mgottlieb@willkie.com
kbender@willkie.com

MANATT, PHELPS & PHILLIPS, LLP
Esra A. Hudson (*pro hac vice*)

Stephanie A. Roeser (*pro hac vice*)
Manatt, Phelps & Phillips LLP
2049 Century Park East, Suite 1700
Los Angeles, California 90067
(310) 312-4000
ehudson@manatt.com
sroeser@manatt.com

*Attorneys for Blake Lively and Ryan
Reynolds*